ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time:

February 2, 2005

Site Contact(s):

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Agency:

CDPHE

Purpose of Contact:

Disposition of Area 5 Survey unit 11

Discussion

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Area 5, survey unit 11 for demolition. Survey unit 11 consisted of rooms 127, 127A, 127B, 141, and 148.

The preparation process for survey unit 11 was initiated April 28, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

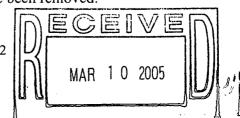
- Concrete shaving, joint removals, and hotspot removals were performed on various floor and wall surfaces.
- The floor in Room 127 was removed.
- Walls were decontaminated or removed as necessary

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in survey unit 11. The following summarizes the non-radiological activities:

- Room 127 was a permitted RCRA container storage area in Unit 776.1. Rooms 127 and 141 provided secondary containment for RCRA-regulated tanks and piping associated with Unit 776.2 and with the mixed residue oil/solvent transfer line. CDPHE approved closure of this area in a contact record dated 7/28/04, contingent on final disposition of the building by removal.
- Chemicals and hazardous substances have been removed.

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ADMIN RECORD

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- Beryllium regulated and controlled areas have been closed. Only Room 127 in this survey unit was on the historical list of rooms with potential beryllium contamination due to the internal contamination of tanks T-1A through T-3. The baseline beryllium characterization and subsequent surveys following equipment removal of this room found no removable beryllium contamination. Prior to final encapsulation, thirty (30) samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm².
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Since part of the floor was removed and the exposed soil may have radiological contamination, an encapsulant, such as soil cement, will be placed over the soil to limit the potential for dispersion during demolition activities. The area will be noted on project maps, and activities in this area will be coordinated with Environmental Restoration personnel.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey unit 11 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey unit 11 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. This contact record will be included in the demolition file to ensure the controls and requirements are included in the demolition work packages for this survey unit.

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